United States Bankruptcy Court Eastern District of Virginia

| In Re: I Case: <u>09-10</u> 3 | | | 19-SSM 1:09-bk-10149 | | | |
|-------------------------------|--------------------|--------------|---|------------------|-------------------|--|
| Christopher Grady | 1 | Chapter: 7 | (S 연 | 701 1 | con y | |
| Debtor | I | | - 162 - 174 - 184 - 184 | MAR 27 | | |
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| | MOTION TO AVOID JU | DGEMENT LIEN | Syl | ن | | |

The debtor hereby moves this Court for relief of a Judgement Lien placed on the property of 22055 Avonworth SQ, Broadlands, VA 20148.

- 1. Unbeknown to the movant, the creditor through counsel obtained a Judgement Lien on the debtor's property at 22055 Avonworth SQ, Broadlands, VA 20148.
- 2. Because the movant was unaware of the Judgement Lien, a request for avoidance of the lien was not requested while the bankruptcy case was active.
- 3. On 11/13/2008 Reston Dental Group, PC d/b/a Dental Arts Center secured a judgement lien against Maria R. Grady and Christopher Grady in the Fairfax County General District Court for services rendered to Maria R. Grady under Case #GV07033186-00 in the original amount of \$1,422.00 and recorded as Instrument #20081118-0067820.
- 4. The movant is currently under a relocation process required by his employer and the escrow company needs the title cleared.
- 5. The movant reached out to the creditor to secure a release to no avail.

WHEREFORE, the movant respectfully requests that the Court enter an order allowing the movant to avoid the Judgement Lien placed on the property and any other relief that the Court finds in order. The time sensitive nature of this matter is imperative.

Dated: 3/27/2017 Attorney Name: Christopher Grady, Pro-Se 22055 Avonworth SQ, Broadlands, VA 20148

703-554-3209

Respectfully Submitted,